

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:23-cr-00089-SE-TSM-1
)	
EVAN GADAROWSKI)	
_____)	

ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE
SENTENCING MEMORANDUM, *NUNC PRO TUNC*

NOW COMES the Defendant, Evan Gadarowski, by and through counsel, and moves this Honorable Court to extend the deadline to file the Defendant's sentencing memorandum, *nunc pro tunc*, to Friday, April 26, 2024. In support of this, the Defendant states as follows:

1. The Defendant is charged with Distribution of Child Pornography pursuant to 18 U.S.C. § 2252A(a)(2)(A) and (b)(1), and Possession of Child Pornography pursuant to 18 U.S.C. § 2252A(a)(5)(B) & (b)(2).

2. This matter is scheduled for a Sentencing Hearing on May 3, 2024, at 2:00 p.m.

3. The sentencing memorandum was due 10 days prior to the sentencing date which was on Tuesday, April 23, 2024.

4. Counsel needs additional time to prepare the memorandum due to the significant volume of information involved, as well as the length of the sentence to be imposed.

5. Defense counsel will file the sentencing memorandum with the Court on Friday, April 26, 2024.

6. Counsel for the Defendant has contacted Assistant United States Attorney Kasey Weiland who assents to the relief requested in this motion.

WHEREFORE, the Defendant prays for the following relief:

A. To extend the filing deadline of the Defendant's sentencing memorandum to April 26, 2024; and

B. For such other relief the Court deems equitable and just.

Respectfully submitted,
Evan Gadarowski
By his attorneys,

WILSON, BUSH & KEEFE, P.C.

Dated: April 24, 2024

/s/ Charles J. Keefe
Charles J. Keefe, NH Bar No.: 14209
378 Main Street
Nashua, New Hampshire 03060
(603) 595-0007
keefe@wbdklaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Assented-Motion to Extend Deadline to File Sentencing Memorandum, *Nunc Pro Tunc*, was this day forwarded to Kasey A. Weiland, Esquire, Assistant United States Attorney through the Electronic Case Filing System.

Dated: April 24, 2024

/s/ Charles J. Keefe
Charles J. Keefe